

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

ROBERT HUBBLE, on behalf of himself and all others similarly situated, Case No. 1:24-CV-11173-TLL-
PTM

Plaintiff,

v.

LOANDEPOT.COM, LLC,

Defendant.

**JOINT STIPULATION TO MODIFY
CASE MANAGEMENT AND SCHEDULING ORDER**

Robert Hubble (“Plaintiff”) and loanDepot.com, LLC (“loanDepot”) hereby stipulate to modify the Case Management and Scheduling Order entered by the Court on August 9, 2024. Dkt. No. 18. In support of this stipulation, the parties state as follows:

1. On August 9, 2024, the Court issued its Case Management and Scheduling Order (the “Order”). Dkt. No. 18.
2. The parties have been diligently working to comply with the deadlines set forth in the Case Management and Scheduling Order and have exchanged discovery requests and responses in a timely manner. Despite these efforts, certain issues have arisen that require additional time for resolution. Specifically, both Plaintiff and loanDepot have served subpoenas on third parties, including Shift44 and LF Media, Inc.

3. At this stage, the parties are still awaiting the production of documents and information in response to some of these subpoenas, while also working through various challenges associated with others. Given the complexity of the issues involved and the need for additional time to fully address the outstanding subpoena-related matters, the parties respectfully request a 90-day extension of the current deadlines. This extension will provide the necessary time to resolve any issues arising from these subpoenas.

4. Plaintiff also previously filed a Motion for Protective Order related to a subpoena served by loanDepot on Plaintiff's phone carrier, Verizon Wireless. Dkt. No. 25. Although Plaintiff prematurely filed a Notice of Withdrawal of his Motion for Protective Order, the underlying dispute remains unresolved. As such, the parties intend to request reinstatement of Plaintiff's Motion for Protective Order and to schedule a hearing on the motion with the Court.

5. In light of the above, the parties seek entry of an order providing a modest extension of scheduling order deadlines as follows:

<u>Event:</u>	<u>Current Deadline:</u>	<u>New Deadline:</u>
Expert Disclosure, Defendant Served By	April 3, 2025	July 2, 2025
Class Certification Motion Filed By	April 30, 2025	July 29, 2025
Class Certification Motion Response Filed By	June 30, 2025	September 28, 2025
Class Certification Motion Reply Filed By	July 21, 2025	October 19, 2025

Discovery Motions Filed By	August 29, 2025	November 27, 2025
Discovery Cutoff	September 29, 2025	December 28, 2025
Motions Challenging Experts Filed By	November 29, 2025	February 27, 2026

6. This is the parties' first request for an extension of the aforementioned deadlines.

7. The parties agree that neither party will be prejudiced by the requested extension, and the parties certify that they are seeking an extension in good faith.

ACCORDINGLY, IT IS HEREBY STIPULATED that the aforementioned deadlines are extended by 90 days.

Dated: April 3, 2025

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*Attorneys for Plaintiff and the Putative
Classes*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 3, 2025, a true and accurate copy of the foregoing was filed with the Court using the Clerk of Court's electronic filing system, which by its operation will send notice of this filing to all parties that have entered an appearance in this matter.

/s/ Brittany A. Andres
Brittany A. Andres